

## **REMARKS**

Currently, claims 1-16 are pending in the application, of which claims 9-16 are withdrawn from further consideration. Accordingly, claims 1-8 are currently active in this application, of which claims 1, 7 and 8 are independent. In view of the following Remarks, Applicant respectfully requests reconsideration and withdrawal of the rejections for the reasons discussed below.

### **Allowed/Allowable Claims**

Applicant appreciates the indication that claims 7 and 8 are allowed and claims 2-6 contain allowable subject matter. While Applicant agrees these claims are patentable over the cited references, Applicant does not agree that patentability resides in each feature exactly as expressed in the claims, nor that each feature is required for patentability of each claim.

### **Rejection of Claims under 35 U.S.C. §103**

Claim 1 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,473,142 issued to Kim, et al. ("Kim"). Applicant respectfully traverses this rejection for at least the following reasons.

Claim 1 recites:

"1. A liquid crystal display, comprising:  
a first substrate;  
a pixel electrode formed on the first substrate and  
having a first aperture pattern;  
a second substrate provided opposing the first  
substrate;

a common electrode formed on the second substrate and having a second aperture pattern;  
a pixel region formed between the first substrate and the second substrate, wherein the first aperture pattern and the second aperture pattern divide the pixel region into a plurality of domains;  
liquid crystal disposed between the first substrate and the second substrate; and  
a spacer provided between the first substrate and the second substrate for maintaining a predetermined gap between the first substrate and the second substrate, wherein the second aperture pattern has a substantially straight portion arranged substantially in parallel with the first aperture pattern, and the spacer is positioned at an end portion of the second aperture pattern.”

In the Office Action, the Examiner asserted that “it would have been obvious to combine teachings of Kim for a wide view angle display of high brightness by a stable arrangement of liquid crystal modules” (Office Action, page 4). This assertion is respectfully disagreed with because the Examiner’s reasoning for the rejection is based on incorrect interpretation of the cited reference or stretching facts found in the reference to fit into the claimed invention.

First, claim 1 recites “the spacer is positioned at an end portion of the second aperture pattern”. In this regard, the Examiner stated “Kim Figure 1 does not appear to explicitly specify or illustrate the spacer disposed at an end portion of the opening area(s).” (Office Action, page 3). Nevertheless, the Examiner concluded “As may be seen in Figure 4C, the dielectric frame (57) is formed at an end of the electric field inducing window (43)” (Office Action, page 4).

Fig. 4C of Kim shows a cut view of an LCD device, not a plane view or a top view, and hence does not allow determining whether the opening formed in the pixel electrode 13 is an end portion of the electric field inducing window 43 or not. Thus, the

Examiner would not be able to determine whether the opening formed at the pixel electrode 13 is an end portion of the electric field inducing window 43 or not. For this reason, it is submitted that the Examiner's position that Fig. 4C of Kim shows "the spacer is positioned at an end portion of the second aperture pattern" has no factually support from Kim.

Second, claim 1 recites "the second aperture pattern has a *substantially straight* portion". In this regard, the Examiner stated "As can be seen in Fig. 5G, the electric field inducing window in the common electrode (17) has a substantially straight portion" (Office Action, page 3).

Fig. 5G does not show the common electrode 17 having an electric field inducing window. The common electrode 17 has a flat surface with no opening formed therein. Thus, there is no aperture pattern formed at the common electrode 17. Also, Fig. 5G is a cut view, not a plane view. Even if there is an opening formed through the common electrode 17, the Examiner would not be able to determine whether such opening has a substantially straight portion or not. Thus, it is submitted that the Examiner's position that the common electrode 17 has a substantially straight portion has no factual support from Kim.

Third, claim 1 recites "the second aperture pattern has a substantially straight portion arranged *substantially in parallel* with the first aperture pattern". In this regard, the Examiner asserted that Fig. 5G of Kim shows "the electric field inducing window of the common electrode (17) with the substantially straight portion is arranged substantially in parallel with the pixel electrode electric field inducing window (43)" (Office Action, page 3).

However, as mentioned above, Fig. 5G of Kim does not show an opening formed at the common electrode 17. Also, Fig. 5G is a cut view, not a plane view. Even if there is an opening formed at the common electrode 17, the Examiner would not be able to determine whether the imaginary opening of the common electrode 17 has a straight portion or not. The Examiner would not be able to determine the opening formed in the pixel electrode 43 is an end portion of the electric field inducing window 43 or not. The Examiner would not be able to determine whether the electric field inducing window 43 is substantially straight or not. Thus, the Examiner would not be able to determine whether the imaginary opening of the common electrode 17 has a substantially straight portion arranged substantially parallel with the electric field inducing window 43.

For this reason, it is submitted that the Examiner's assertion that Kim shows "the electric field inducing window of the common electrode (17) with the substantially straight portion is arranged substantially in parallel with the pixel electrode electric field inducing window (43)" has no factual support.

For these reasons, it is respectfully submitted that Kim fails to disclose or suggest (a) "the spacer is positioned at an end portion of the second aperture pattern", (b) "the second aperture pattern has a substantially straight portion arranged substantially in parallel with the first aperture pattern", as recited in claim 1. No secondary reference has been introduced to cure the deficiency of Kim. Thus, it is submitted that claim 1 is patentable over Kim.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claim 1.


## Conclusion

Applicant believes that a full and complete response has been made to the Office Action and respectfully submits that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully Submitted,



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